ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service   )   Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-36-42)
(September 30, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby

incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director

OCA/USPS-T3-36. Please refer to your response to OCA/USPS-T3-4(c), OCA/USPS-T3-32, and USPS-LR-1/MC98-1, Attachment 2.

a.   For the "ANNUAL COSTS, YR 1999," please confirm that labor, or labor-related, costs of providing the information technology services related to Mailing Online total $1,074,000. If you do not confirm, please explain and provide the correct amount.

b.   Please confirm that the labor, or labor-related, costs of providing the information technology services related to Mailing Online constitute 68.9 percent ($1,074,000 / $1,558,624) of the "ANNUAL COSTS" for the year 1999. If you do not confirm, please explain and provide the correct percentage.

c.   Please explain how your statement in OCA/USPS-T3-4(c) that "technology costs . . . account for more than fifty percent of the total" is consistent with the percentage figure calculated in part (b) of this interrogatory.

OCA/USPS-T3-37. Please refer to USPS-LR-1/MC98-1, Attachment 2, at page 17.

a.   Please confirm that during the expanded (market) test, the print site is to have one FTP server and one "hot backup" server. See Tr. 2/283-84. If you do not confirm, please explain.

b.   Please confirm that the Postal Service will be responsible for installing one FTP server and one "hot backup" server at each print site during the experimental service. If you do not confirm, please explain.

c.   For the "FIXED COSTS, YR 1999," please confirm that the 10 "Initial Print Sites -

FTP Servers" represent one FTP server for each print site established in 1999

for the experimental service. If you do not confirm, please explain.

d.   In Attachment 2, please identify where the "FIXED COSTS" of the "hot backup"

server are to be found for each of the 10 print sites established in 1999 for the

experimental service.

OCA/USPS-T3-38. Please refer to USPS-LR-1/MC98-1, Attachment 1. Assume a

black and white, 8.5x11, simplex document and 5,000 addresses. Please confirm that

for a mail merge job, an individual print file would be created for each of the 5,000

addresses. If you do not confirm, please explain.

OCA/USPS-T3-39. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7, under

the heading, "PROCESSING CENTER - APPLICATION SERVER: Source File to PDF

Conversion."

a.   Please confirm that the figure, 10,063.76, "Bytes Per Second During Peak

Hours," is calculated by multiplying the "Average Bytes Per Incoming Customer

Transmission" (839,964.69) and the "Incoming Documents/Mailing Lists Per

Second During Peak Period" (0.01). If you do not confirm, please explain.

b.   Please confirm that the figure, 839,964.69, "Average Bytes Per Incoming

Customer Transmission," is calculated as follows: (3.2 * 5,020) + (4,120 * 200),

i.e., (Number of pages per Document * Number of Bytes Per Page Word

Processing/Desk Top Publishing) + (Number of Addresses Per Mailing List *

Number of bytes per address). If you do not confirm, please explain.

OCA/USPS-T3-40. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7, under

the heading, "PROCESSING CENTER - NETPOST COMMAND CENTER SERVER."

a.   Please confirm that the figure, 10,063.76, represents the number of "Incoming

bytes Per Second During Peak Hours" in PDF format. If you do not confirm,

please explain.

b.   Please confirm that the figure, 1,516,231, "Bytes Processed Per Second During

Peak Hours," is in Postscript format. If you do not confirm, please explain.

c.   Please confirm that the figure referred to in part (a) of this interrogatory is not

used in the calculation of the figure, 1,516,231, "Bytes Processed Per Second

During Peak Hours." If you do not confirm, please explain.

OCA/USPS-T3-41. Please refer to Tr. 3/766, and USPS-LR-1/MC98-1, Attachment 1,

at page 7. In USPS-LR-1/MC98-1, the figure 30,720 is described as the "Number of

Bytes Per Mailing Piece Transaction." Please confirm that the figure 30,720 represents

the number of bytes *per page*, as stated at Tr. 3/766. If you do not confirm, please

explain.

OCA/USPS-T3-42. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 7.

a.   Please confirm that the "Number of Bytes Per Mailing Piece Transaction" should be 98,304 (30,720 * 3.2 Number of pages per Document). If you do not confirm, please explain.

b.   Please confirm that the figure, 1,516,231, "Bytes Processed Per Second During Peak Hours," should be 4,851,938 (98,304 * 49.35647 Mail Merge Transactions Per Second During Peak Hours). If you do not confirm, please explain.

c.   Please confirm that the figure, 1,516,231, "Bytes Processed Per Second During Peak Hours," should also include the calculation "Number of addresses Per Mailing List" times the "Number of bytes per address." If you do not confirm, please explain. If you do confirm, please provide the number of bytes per address.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
September 30, 1998